

U S WEST, Inc.
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EX PARTE OR LATE FILED

USWEST

Elridge A. Stafford
Executive Director -
Federal Regulatory

June 15, 1995

DO NOT FILE THIS ORIGINAL

RECEIVED

JUN 15 1995

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Stop Code 1170
Washington, D.C. 20554

RE: CC Docket No. 95-20, CI-III Further Remand

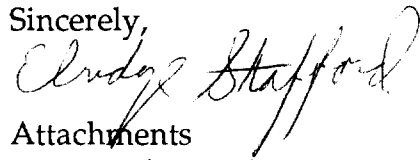
Dear Mr. Caton:

Please be advised that representatives of U S WEST met today with Kevin Werbach, Peggy Reitzel, and Rose Crellin of the Common Carrier Bureau to discuss U S WEST's ONA Compliance procedures. The U S WEST representatives were Sandra Sanchez, Senior Compliance Director - U S WEST Communications, Sara Van Horne, Manager - U S West Communications, Ivy Stevens, Manager - U S WEST Communications, Robert McKenna, Corporate Counsel - U S WEST and Elridge Stafford, Executive Director - U S WEST.

Attached are copies of documents and transcripts of videos that were used at this meeting. In accordance with Section 1.1206(a)(a) of the Commission's rules the original and one copy of this letter, with attachments, are being filed with your office. Please associate this letter and the attachments with the above mentioned proceeding.

Acknowledgement and date of receipt of this information are requested. A duplicate of this letter is included for this purpose. Please contact me should you have any questions concerning this matter.

Sincerely,



Attachments

cc: w/o attachments
Kevin Werbach
Peggy Reitzel
Rose Crellin

No. of Copies rec'd
List ABCDE

041

ONA Compliance at U S WEST

<u>Structure</u>	<u>Integrated ONA Training/Education</u>	<u>Tools</u>	<u>Product Review</u>
<ul style="list-style-type: none">• Dedicated ONA Team• Structure for Oversight• Integration of ONA into basic business operations	<ul style="list-style-type: none">• Commitment to Training• Individual Responsibility• Certification	<ul style="list-style-type: none">• Corporate Policies• Job Aids/Forms• Communications• Internal Enforcement	<ul style="list-style-type: none">• Integrated• Standardized

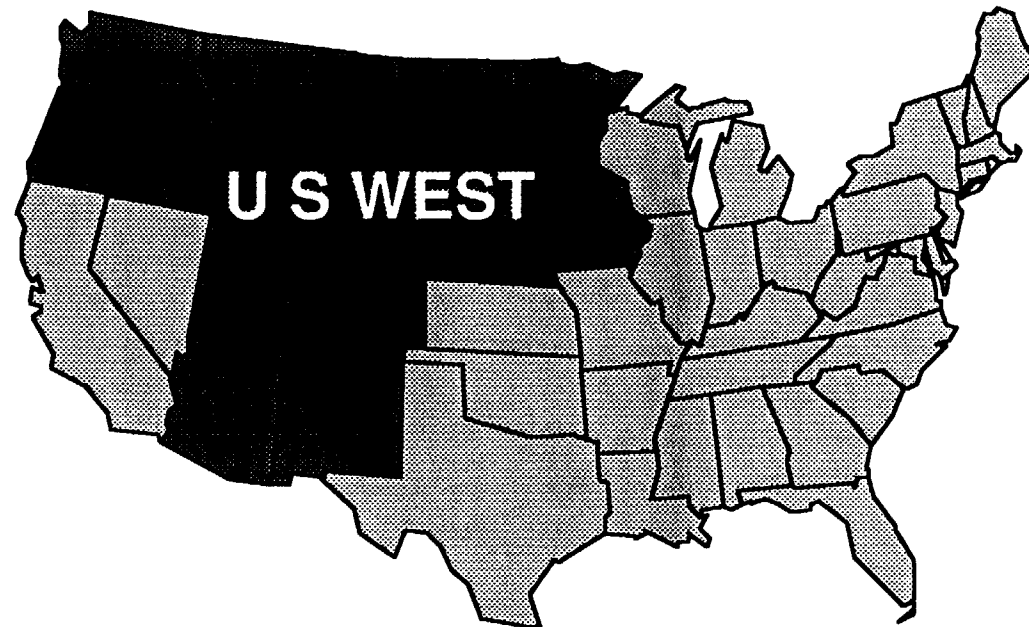
6/13/95

U S WEST Communications

ONA Compliance at U S WEST

<u>Structure</u>	<u>Integrated ONA Training/Education</u>	<u>Tools</u>	<u>Product Review</u>
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ONA Compliance at U S WEST



U S WEST Communications provides a full range of connection services to more than 25 million customers in 14 western and midwestern states.

Personal Responsibility



Dick McCormick
Chairman & CEO
U S WEST, Inc.

"...the responsibility for understanding and complying with the FCC principles rests on U S WEST as a Company"

- ONA & the Information Super Highway, 1994



Gary Ames
President & CEO
US WEST Communications

"As with the MFJ/CECO/EO training, U S WEST takes ONA, CPE and enhanced service compliance seriously. It is a part of the way U S WEST does business."

*- ONA*CPE*Enhanced Services Compliance, 1991*



Jack MacAllister
Former Chairman & CEO
U S WEST, Inc.

"ONA is a condition of employment"

- Speeches before employee groups, 1988-89

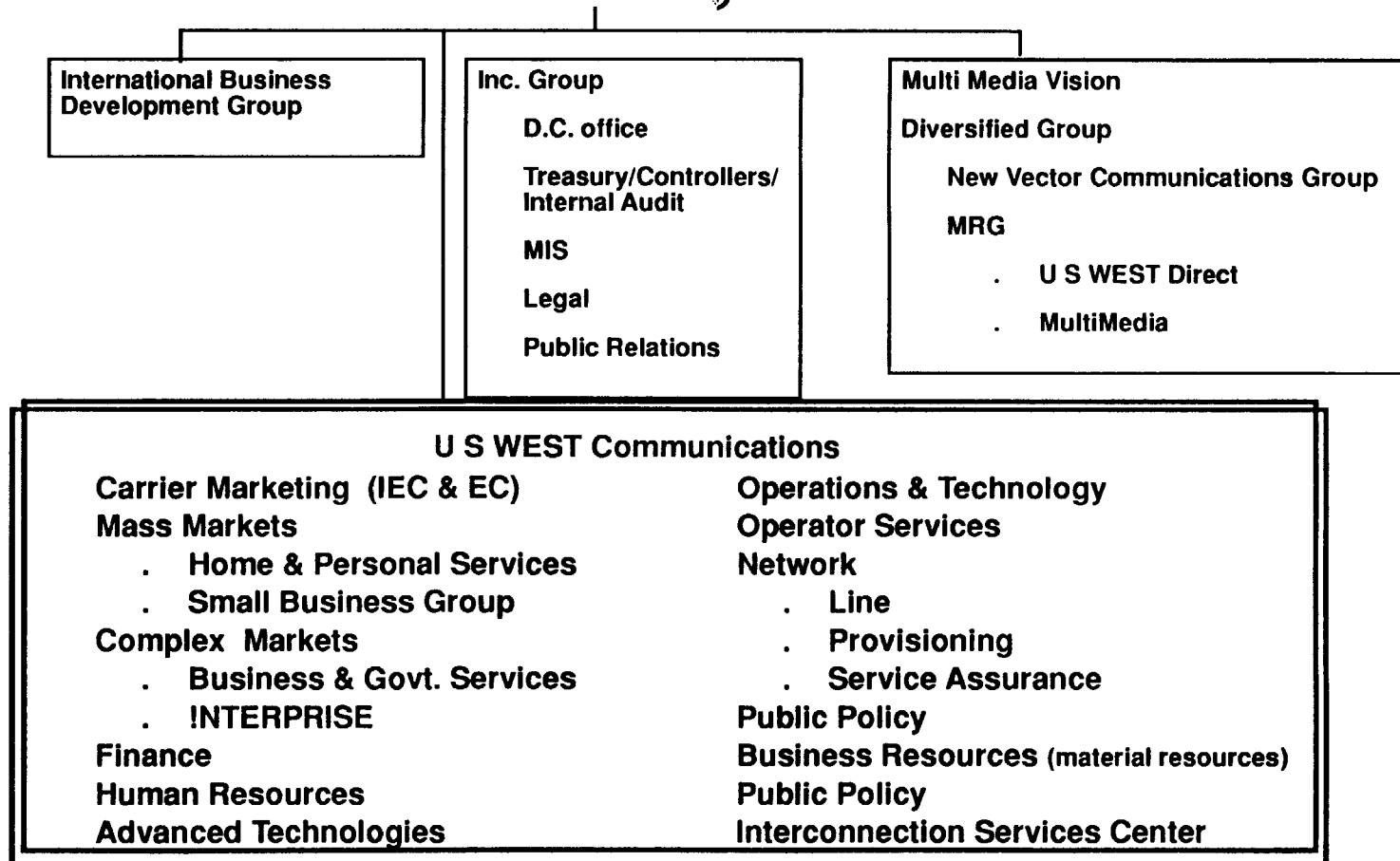


Sandra Sanchez
Senior Compliance
Director ONA

"I am personally responsible for ONA Compliance. Salary reviews, etc. of my entire team depend on the overall U S WEST compliance with the ONA rules."

U S WEST Structure

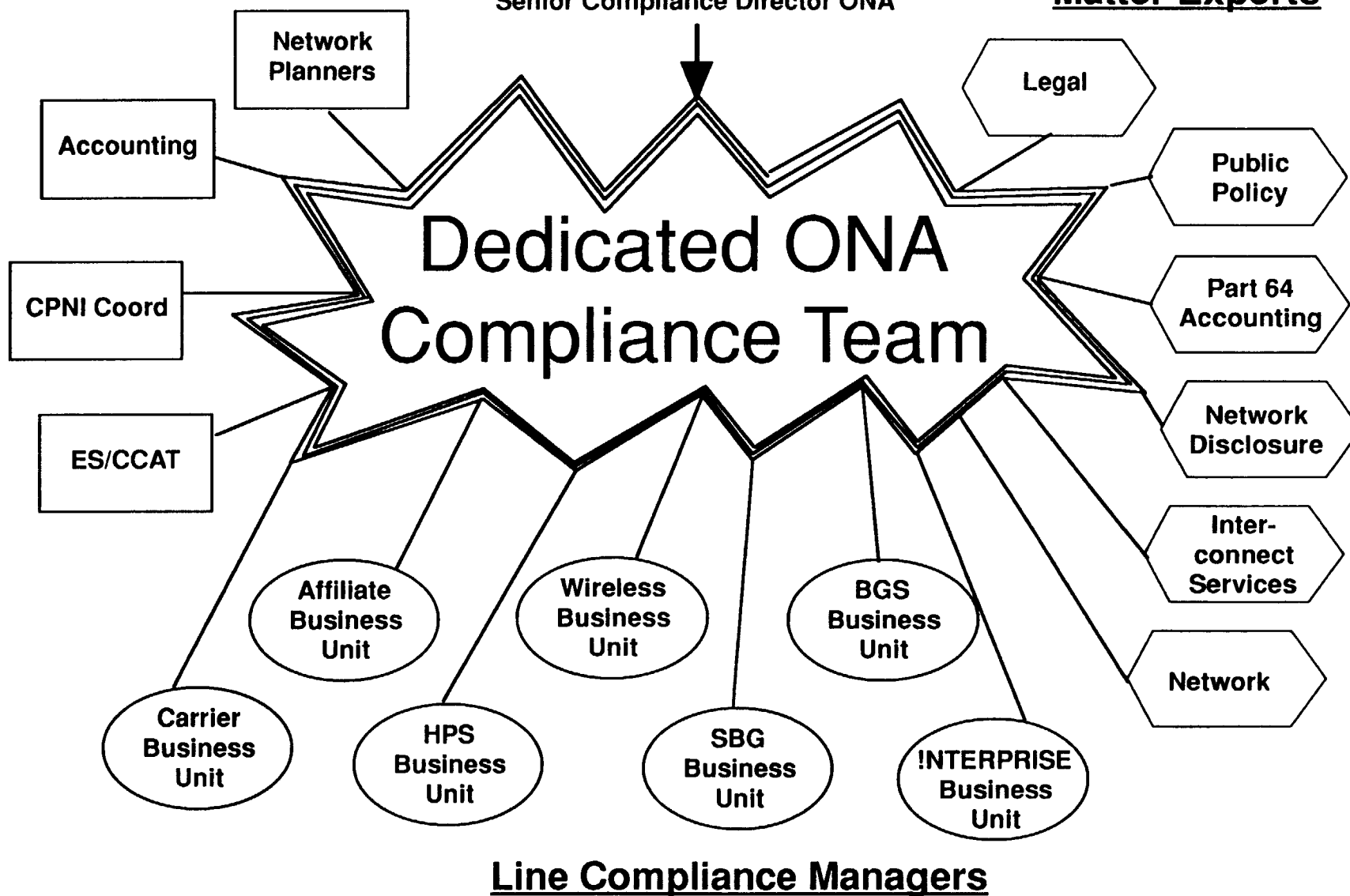
U S WEST, Inc.



Special Teams

Executive Vice President, Complex & Mass Markets
Executive Director, Markets Regulatory Strategy
Senior Compliance Director ONA

Key Subject Matter Experts

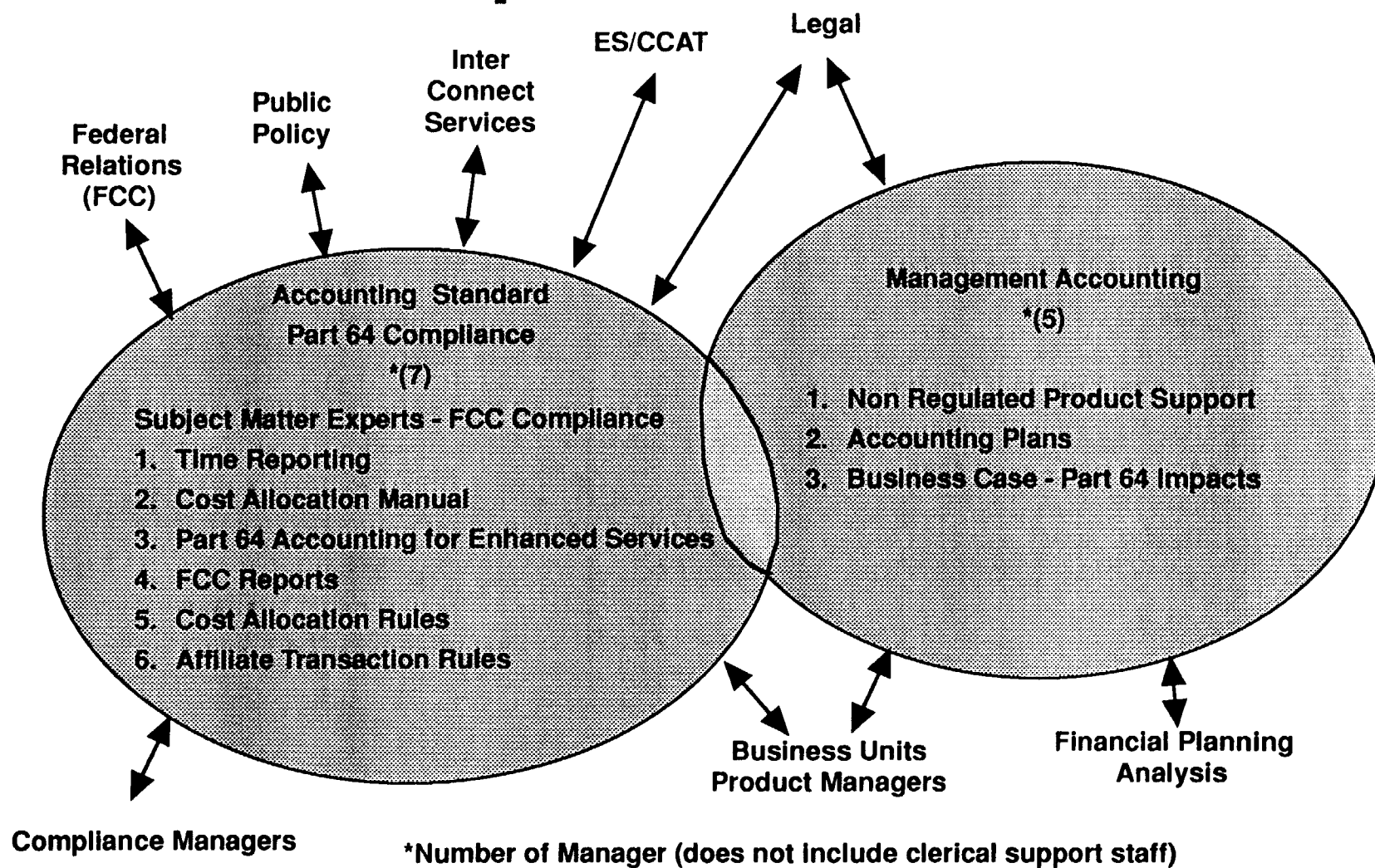


6/13/95

U S WEST Communications

Structure

Partnerships



ONA Compliance at U S WEST

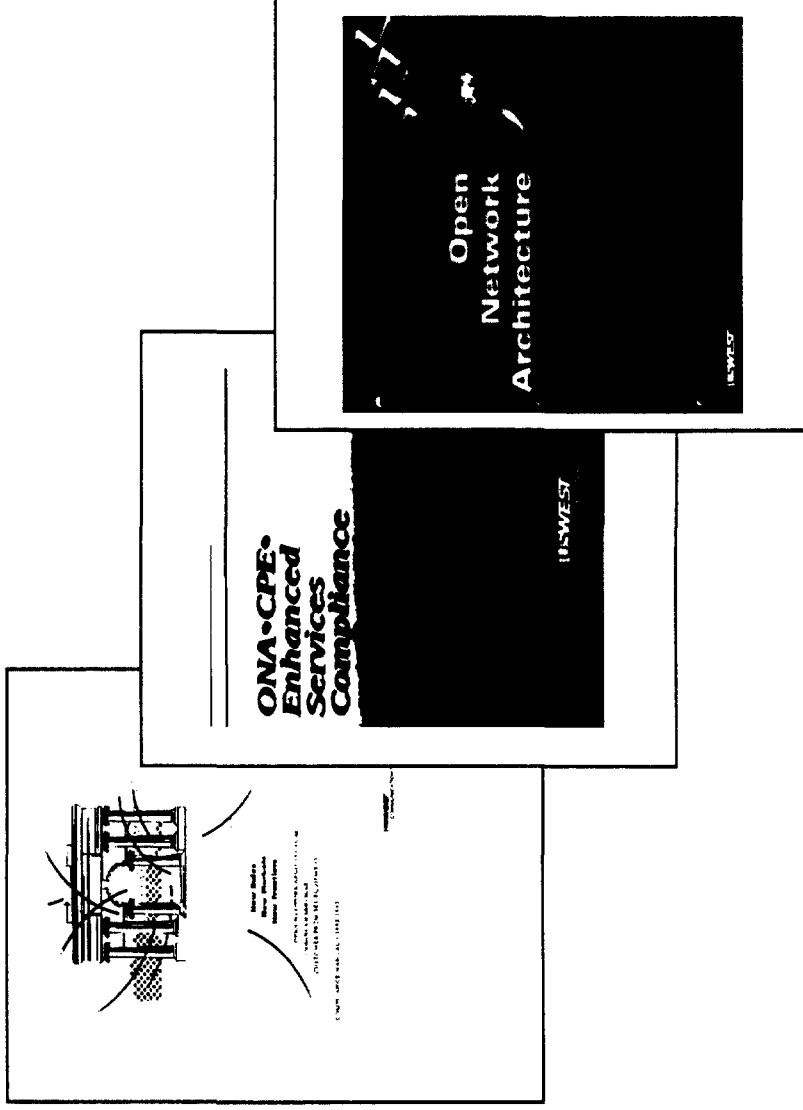
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General Training

- Manuals

- Videos

Training Manuals



Targeted Training

- Manuals
- Videos
- Interactive Video



Compliance Manager Training

- **Compliance Managers Conference**
- **“Training Series”**
- **Conference Calls**

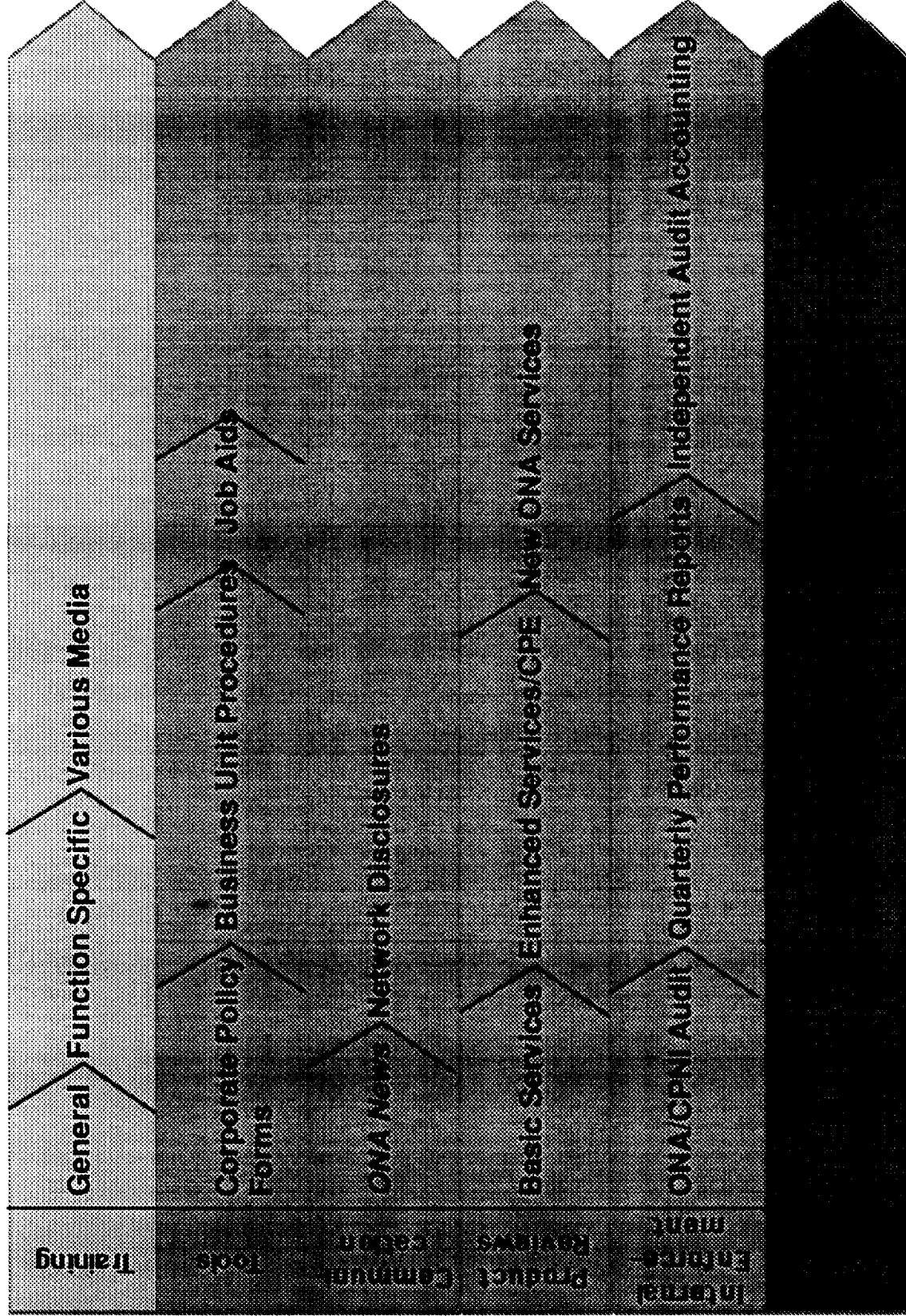
Employee Certification

- **Standard form assists tracking**
- **Provides record of employees who have received training**
- **Supervisor certifies affected non-management employees have received training**

ONA Compliance at U S WEST

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COMPANION



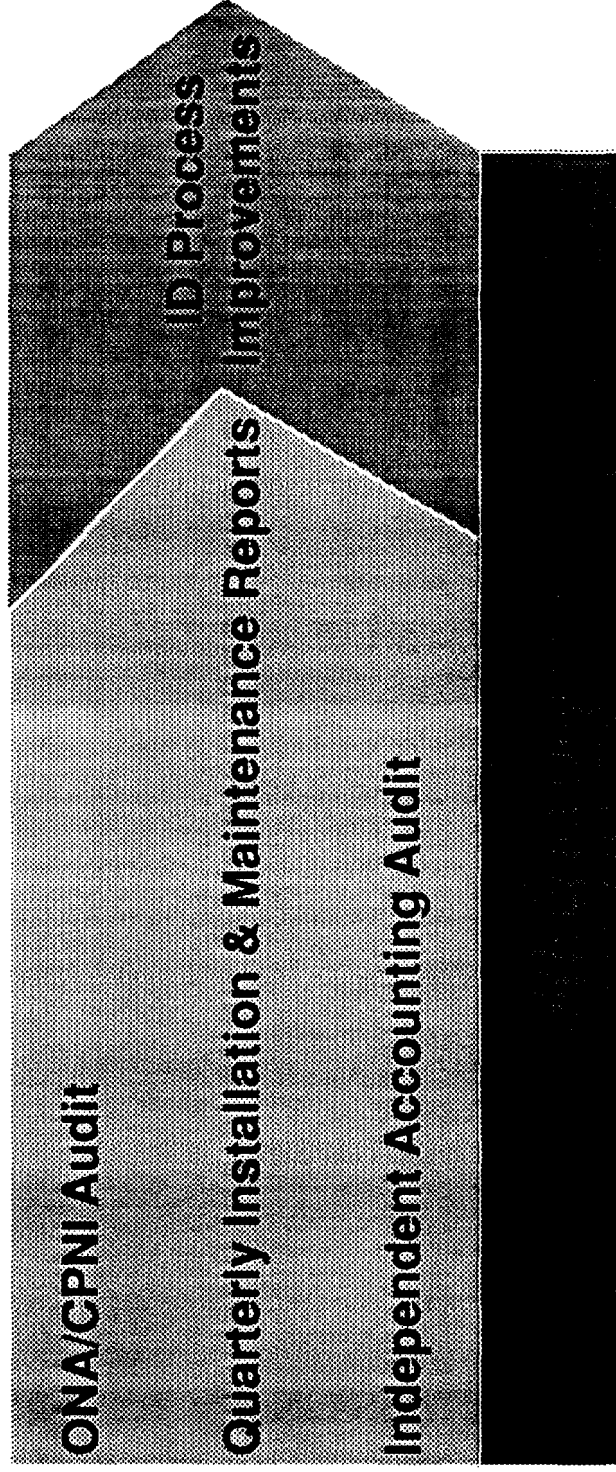
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U S WEST Communications

Tools

Internal Enforcement

O C P I - A N O E



ONA/CPE Job Aids

ON-A-SERVICES
FOR REQUIREMENTS

What are ONA
services?

1. CHINA appears most likely to be a potential competitor in the market for high performance fiber.
2. CHINA has the largest number of spinning spindles in the world.
3. CHINA has the largest number of spinning spindles in the world.
4. CHINA has the largest number of spinning spindles in the world.
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19. CHINA has the largest number of spinning spindles in the world.
20. CHINA has the largest number of spinning spindles in the world.

**FCC TRIAL GUIDELINES
FOR
U.S. WEST ENHANCED SERVICES AND CPE**

Declaration

When it comes to recruiting privateers, the ROC's Internet site lists the basic service offerings and the benefits services the bank can provide. "We are a leading provider of financial services to the U.S. WEST nationwide," the ROC site also explains. "A WEST of talented workers in CNY (New York) are well advanced in a variety of financial services. We are seeking to add more advanced operations (financial sales) by recruiting all basic service sales and support staff (or advisors) to the privateers' position. We are looking for individuals who are self-motivated, self-starting, and an individual who is able to sell for CNY. Education and experience are not a requirement. Please email your resume to: roc@west.com or fax to: 1-800-866-8666. The selection process will be completed by the end of the month." The selection process will be completed by the end of the month.

1. TECHNICAL ANALYSIS OF INSTANT SERVICE:

- [illegible]

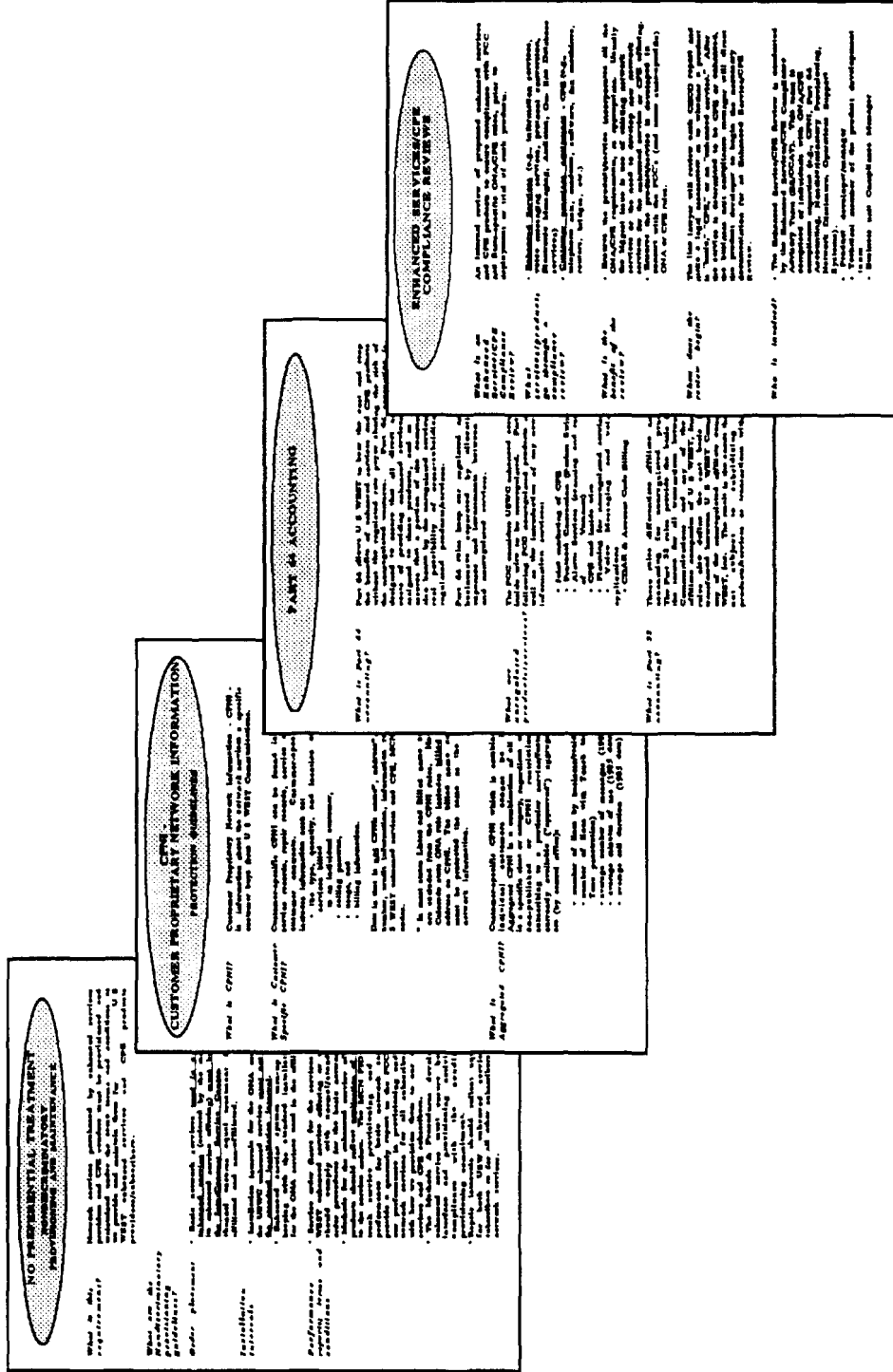
**BASIC SERVICE
ON A COMPLIANCE REVIEW**

An internal review of proposed has to satisfy the following conditions: (i) it is necessary to identify if there are DNA viruses, and if so, to ensure compliance with FCC and State specific DNA rules prior to deployment or sale of such products.

- [illegible]

Basic Services

ONA/CPE Job Aids



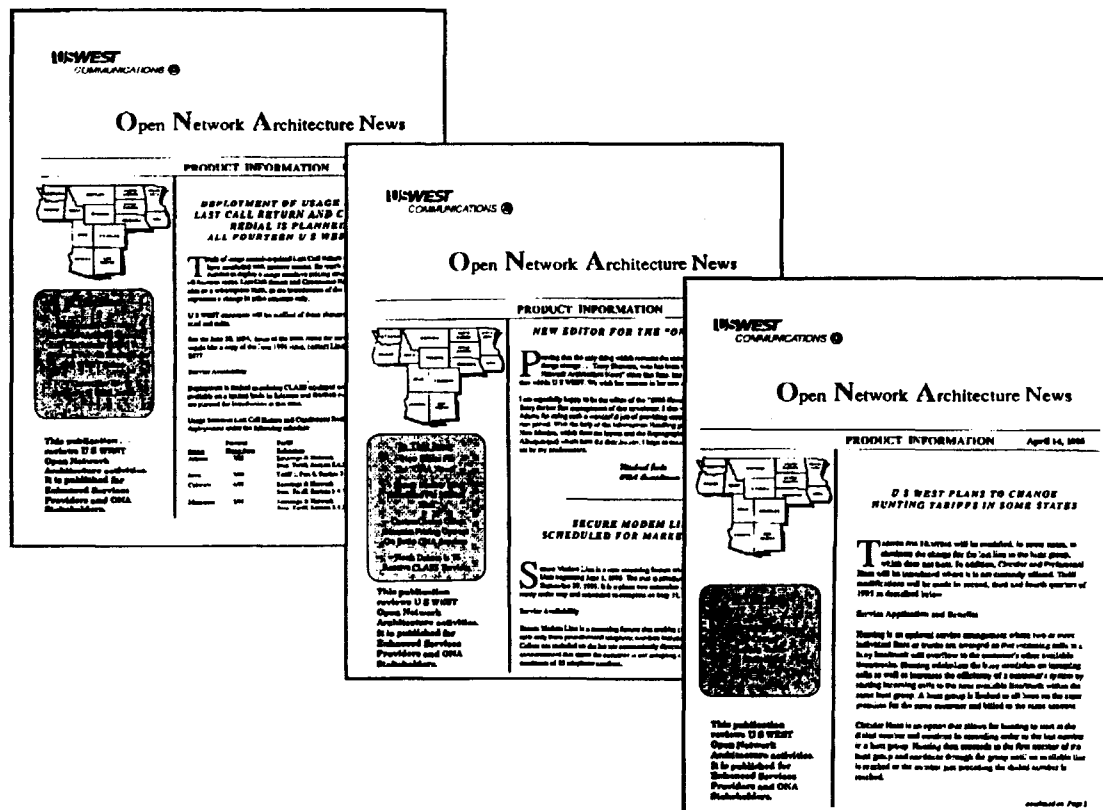
Enhanced Services

6/13/95

U S WEST Communications

Tools

ONA Newsletters



6/13/95

U S WEST Communications

Tools

Network Disclosures

NETWORK DISCLOSURE NEWS

No. 1 JANUARY 1995

NEW-FEATURE AVAILABILITY UPDATE

Original Disclosure Date: August 6, 1994
Revised: October 4, 1994

Summary: U.S. WEST is expanding the availability of the Switched 66 kbit/s Service to include all U.S. WEST service areas. This new service will be available to all U.S. WEST service areas by January 1, 1995.

Locations: All U.S. WEST service areas.

Timing of Deployment: The service will be available to all U.S. WEST service areas by January 1, 1995.

Business Requirements: A local area network (LAN) or wide area network (WAN) must be in place and operational. The service is not available to areas where the network is not operational.

Additional Information: For more information, contact your local U.S. WEST representative or call 1-800-444-4444.

NETWORK DISCLOSURE NEWS

No. 1 JANUARY 1995

Switched 66 kbit/s Service Update 1/5/95

Original Disclosure Date: February 28, 1994

Summary: U.S. WEST provides switched 66 kbit/s service to all U.S. WEST service areas. This service is available to all U.S. WEST service areas by January 1, 1995.

Timing of Deployment: The service will be available to all U.S. WEST service areas by January 1, 1995.

Business Requirements: A local area network (LAN) or wide area network (WAN) must be in place and operational. The service is not available to areas where the network is not operational.

Additional Information: For more information, contact your local U.S. WEST representative or call 1-800-444-4444.

NETWORK DISCLOSURE NEWS

No. 1 JANUARY 1995

Token Ring and CSMA/CD LAN Interfaces

UPDATE 1/27/95

Original Disclosure Date: January 14, 1994

Summary: U.S. WEST provides Token Ring and CSMA/CD LAN interfaces to all U.S. WEST service areas. This service is available to all U.S. WEST service areas by January 1, 1995.

Timing of Deployment: The service will be available to all U.S. WEST service areas by January 1, 1995.

Business Requirements: A local area network (LAN) or wide area network (WAN) must be in place and operational. The service is not available to areas where the network is not operational.

Additional Information: For more information, contact your local U.S. WEST representative or call 1-800-444-4444.

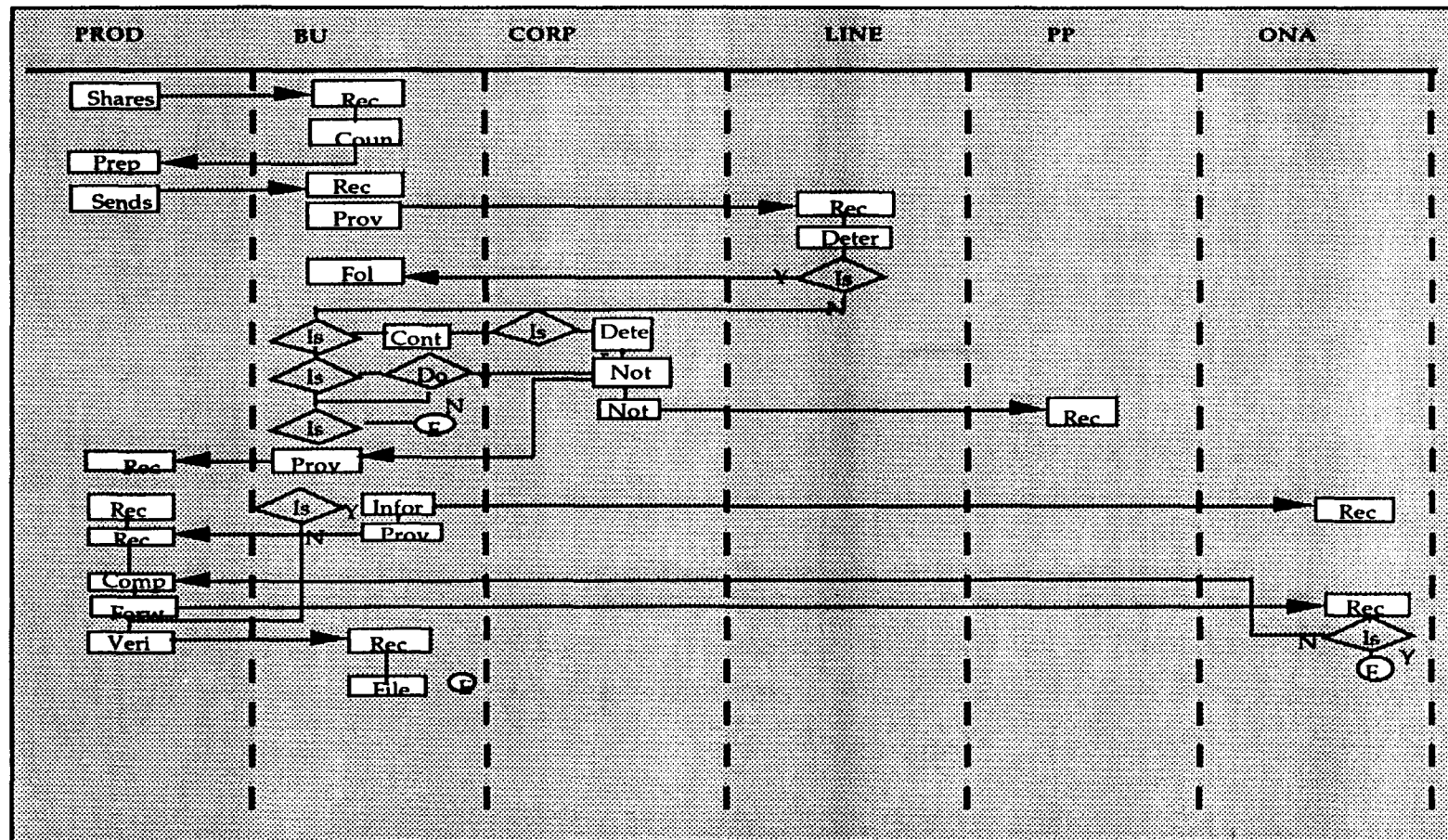
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Product Reviews

	Basic Service ONA Review	Enhanced Services/CPE Compliance Review	"120-Day" Review
What	Network Services	U S WEST Enhanced Service/CPE Product Ideas	ESP and U S WEST enhanced service network capability request
Who	Business Unit Compliance Manager and ONA Subject Matter Experts	Enhanced Service/CPE Compliance Advisory Team	ONA Product Team
How	Formal Process (See flow chart and job aids)	<ul style="list-style-type: none"> - Formal Process (see flow chart and job aids) - Consistent Application of Safeguards 	Formal Process (see job aids)
Output	ONA status of Network Services	Certification of Compliance	Status of request

Basic Service ONA Compliance Review Process



ES/CCAT Function Chart

